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IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

United States of America
Plaintiff,

v.

\$200,000 in U.S. Currency,
Defendant

Case No. 2:22-CV-7443-AB-PD

**RESPONSE TO
GOVERNMENT’S TRIAL BRIEF**

Jury Trial: Feb. 27, 2024, 8:30 a.m.
Courtroom 7B

On February 20th, 2024, Plaintiff United States of America filed a trial brief. ECF No. 90. Claimant Jasmol Sing hereby responds.

During the final pretrial conference, Plaintiff indicated that it would be calling its expert Peter Platt only to educate the jury as to “red flags” regarding suspicious bank activity, and not directly to accuse Claimant of money laundering, in order to limit Claimant’s ability to examine witnesses. The Court allowed Mr. Platt to remain on the witness list on this basis. The trial brief, however, asks to introduce this expert’s report as evidence, and that report unambiguously opines that “activity in [Claimant’s] Account[s] are indicative of money laundering.” Trial Brief, Ex. A, p. 14, ¶ 19.

It is clear from the trial brief’s request and a review of the report that the government intends to use Mr. Platt to accuse – overtly or not – Claimant of money laundering. Claimant will not only ask the Court to deny any request to introduce

1 Mr. Platt's report as evidence, but will ask the Court to reconsider whether Mr. Platt
2 may testify at all.
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19 Dated: Los Angeles, CA
20 February 21st, 2024

Respectfully submitted,

21 /s/Jonathan Corbett
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